

1 Q. Do you recognize the location that this video
2 depicts?

3 A. We are in the Raleigh North Apartments.

4 Q. Is that an area you're familiar with?

5 A. Very.

6 Q. Why?

7 A. I've personally responded to calls there. We
8 have served numerous search warrants there. We've made
9 numerous drug arrests, arrests for weapons violations,
10 homicide suspects, stolen cars, crimes of that nature. It
11 has a high propensity for gang activity and drug sales and
12 violent crimes occur there all the time.

13 Q. How often have you been there in the last few
14 years?

15 A. I would say I'd got there -- at least patrol
16 through that neighborhood at least once a month. If we
17 don't have something going on there or we're not
18 responding to a call there, we at least make a point to
19 proactively also patrol the area.

20 Q. And did you say that it's run by the City of
21 Raleigh?

22 A. I believe it's a City of Raleigh housing
23 complex, yes.

24 Q. Is that public housing?

25 A. Public housing.

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1 Apartment B, on Burgundy Street. This was the apartment
2 that was pointed out to me on the scout, with the
3 corresponding numbers and apartment letter match what is
4 on the search warrant.

5 We deployed from one building over, so that way
6 our approach would not be seen. But as you can see, it's
7 daylight of some sort. I don't remember what time of day
8 it was, but as I rounded the corner to go to the front of
9 that building to approach Apartment B, there were four
10 teenagers or teenage-aged males, what looked like to me in
11 that split second, standing out front of our target
12 location.

13 As we approached, obviously in full tactical
14 gear with "Police" on every side of our body, obviously,
15 the police -- and we are no stranger over there in that
16 neighborhood, as I have mentioned before. Everybody knows
17 who we are. Everybody knows what the police look like.
18 Everybody knows what the Selective Enforcement Unit
19 members look like.

20 As we approached that, around that corner, those
21 males were alerted to our presence and, obviously, readily
22 identifiable as police, upon seeing our presence, fled
23 into the apartment in which we had a search warrant for
24 and two others fled -- or two fled into the target
25 apartment and two others fled into the adjacent apartment

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1 next door.

2 Q. And what did you do at that point?

3 A. I pursued the subjects running into the -- into
4 Apartment B because that was where our search warrant is
5 for. Obviously, our presence had already been made known
6 because we are readily identifiable as police officers,
7 and upon our presence fled, so I gave chase in direct
8 pursuit of the subject into the target apartment, and that
9 subject was just -- I think he fell or tripped over
10 something in the apartment and he sat there on the floor
11 and was detained in that capacity.

12 Q. So the pursuit of a subject, is that -- that's
13 something you mentioned to me earlier, right, as maybe an
14 exigency?

15 A. That's part of it.

16 Q. Can you tell me about that?

17 A. Well, again, we had a search warrant for this
18 location. The subjects were standing out in front of that
19 location and then they entered that location, as if -- I
20 guess it doesn't matter if they live there or they're
21 visitors, but they entered that location. The door is not
22 fortified at that point. It is wide open.

23 Clearly, our purpose and authority was made
24 known by our presence and by their flight into the
25 location, so, therefore, I have the authority to pursue